

FILED  
MAR 11 2021  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT **JUDGE CALABRESE**

Plaintiff,

)

v.

)

RICHARD GOULD,

)

Defendant.

)

) CASE NO. **1:21CR159**

) Title 26, United States Code,  
Section 7206(1)

COUNT 1

(Making and Subscribing False Tax Returns, 26 U.S.C. § 7206(1))

The Grand Jury charges:

1. On or about April 17, 2015, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant, RICHARD GOULD, a resident of Strongsville, Ohio, who was married, did willfully make and subscribe, jointly with his spouse, a United States Individual Income Tax Return (Form 1040), for calendar year 2014, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which Defendant did not believe to be true and correct as to every material matter, in that as he then and there well knew and believed, the return understated his total income on line 22 by failing to report income Defendant had that year, and that he knew that in fact his reported total income was false and that his actual total income substantially exceeded the amount reported,

and the return falsely stated that Defendant's occupation was "unemployed" when he knew in fact that he was gainfully employed.

In violation of Title 26, United States Code, Section 7206(1).

COUNT 2  
(Making and Subscribing False Tax Returns, 26 U.S.C. § 7206(1))

The Grand Jury further charges:

2. On or about April 8, 2016, in the Northern District of Ohio, Eastern Division and elsewhere, Defendant, RICHARD GOULD, a resident of Strongsville, Ohio, who was married, did willfully make and subscribe, jointly with his spouse, a United States Individual Income Tax Return (Form 1040), for calendar year 2015, which was verified by a written declaration that it was made under the penalties of perjury, which was filed with the Internal Revenue Service, and which Defendant did not believe to be true and correct as to every material matter, in that as he then and there well knew and believed, the return understated his total income on line 22 by failing to report income Defendant had that year, and that he knew that in fact his reported total income was false and that his actual total income substantially exceeded the amount reported, and the return falsely stated that Defendant's occupation was "unemployed" when he knew in fact that he was gainfully employed.

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL.

Original document – Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.